

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

GEORGES BRIGUET,

Defendant.

)
) Case No. 2:17-cv-3482-RJD-SIL
)

) The Hon. Raymond J. Dearie, U.S.D.J.
)

) The Hon. Steven I. Locke, U.S.M.J.
)

STIPULATION

The parties hereby stipulate to the truth of the following facts for purposes of this action:

1. On June 30, 2008, the U.S. government requested that a federal court authorize the IRS to serve UBS with an official document known as a summons. The summons required UBS to provide the IRS with the names of all of its U.S. clients with accounts in Switzerland that had not been disclosed by the bank.

2. On July 1, 2008, via a public order, the court granted the government's request.

3. Shortly thereafter, the IRS served UBS with the summons.

4. On July 17, 2008, UBS publicly announced that it would no longer provide offshore banking services to U.S. residents through its Swiss branches.

5. On July 17, 2008, UBS publicly announced that it was working to disclose to the U.S. government the names of U.S. clients who may have engaged in tax fraud.

6. On February 18, 2009, UBS entered into a publicly announced deferred prosecution agreement on charges of conspiring to defraud the United States by impeding the IRS. As part of the agreement, UBS agreed to provide the United States government with the identities of certain of its U.S. clients.

Respectfully submitted,

For the UNITED STATES OF AMERICA:	For GEORGES BRIGUET:
<u>/s/ Arie M. Rubenstein</u> ARIE M. RUBENSTEIN Trial Attorney, Tax Division U.S. Department of Justice P.O. Box 55 Washington, D.C. 20044 202-307-6588 (v) 202-514-5238 (f) Arie.M.Rubenstein@usdoj.gov	<u>/s/ Brian Ketcham</u> BRIAN KETCHAM 4 World Trade Center, 29th Floor 150 Greenwich Street New York, New York 10007 Tel: (212) 518-6380 Fax: (866) 467-7591 Email: bk@ketchampllc.com